| 1                   | DAVID CHIU, State Bar #189542                                    |                                   |
|---------------------|--|-----------------------------------|
| 2                   | City Attorney  |                                   |
| 2                   | YVONNE R. MERÉ, State Bar #173594<br>Chief Deputy City Attorney  |                                   |
| 3                   | WAYNE SNODGRASS, State Bar #148137                               |                                   |
| ٦                   | TARA M. STEELEY, State Bar #231775                               |                                   |
| 4                   | THOMAS S. LAKRITZ, State Bar #161234                             |                                   |
|                     | JOHN H. GEORGE, State Bar #292332                                |                                   |
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|                     | kaitlyn.murphy@sfcityatty.org                                    |                                   |
| 12                  |  |                                   |
|                     | Attorneys for Defendant  |                                   |
| 13                  | CITY AND COUNTY OF SAN FRANCISCO                                 |                                   |
|                     |  |                                   |
| l4                  |  |                                   |
| ا ہے،               | UNITED STATES DISTRICT COURT                                     |                                   |
| 15                  | NORTHERN DISTRICT OF CALIFORNIA                                  |                                   |
| 6                   | NORTHERN DIST  | RICI OF CALIFORNIA                |
|                     |  |                                   |
| 17                  |  |                                   |
| ,                   | JANE ROE, an individual; MARY ROE, an                            | Case No. 4:24-cv-01562-JST        |
| 18                  | individual; SUSAN ROE, an individual; JOHN                       |                                   |
|                     | ROE, an individual; BARBARA ROE, an                              | DEFENDANT CITY AND COUNTY OF SAN  |
| 9                   | individual; PHOENIX HOTEL SF, LLC, a                             | FRANCISCO'S ADMINISTRATIVE MOTION |
|                     | California limited liability company; FUNKY                      | TO SEAL DOCUMENTS                 |
| 20                  | FUN, LLC, a California limited liability                         |                                   |
|                     | company; and 2930 EL CAMINO, LLČ, a                              |                                   |
| 21                  | California limited liability company,                            |                                   |
|                     | D1 : .: cc   | Trial Date: None set.             |
| 22                  | Plaintiffs,  |                                   |
| 23                  |  |                                   |
| 23                  | VS.  |                                   |
| 24                  | CITY AND COUNTY OF SAN   |                                   |
| -                   | FRANCISCO, a California public entity,                           |                                   |
| 25                  | case co, a camonia paone chary,                                  |                                   |
|                     | Defendant.   |                                   |
| 26                  |  |                                   |
| _                   |  |                                   |
| 7                   |  |                                   |

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Pursuant to Civil Local Rules 79-5 and 7-11, Defendant City and County of San Francisco ("San Francisco") moves to file under seal the following:

- Exhibits A, B, and C to the Declaration of John H. George in Support of Defendant

  City and County of San Francisco's Statement of Non-Opposition to Plaintiffs' Motion

  for Administrative Relief Requesting Permission to Use a Pseudonym on Publicly Filed

  Pleadings; and
- Page 2, lines 10-21 of Defendant City and County of San Francisco's Statement of Non-Opposition to Plaintiffs' Motion for Administrative Relief Requesting Permission to Use a Pseudonym on Publicly Filed Pleadings.

To avoid improper disclosure of potentially confidential information, San Francisco will file the above-referenced materials conditionally under seal pending the Court's ruling on the administrative motion.

San Francisco takes no position regarding the confidentiality of the conditionally sealed information and only requests it be sealed out of an abundance of caution given that the Court has not yet ruled on Plaintiffs' Administrative Motion to use pseudonyms and the documents identify one of the Plaintiffs. Although it is Plaintiffs' burden to show good cause, San Francisco sets forth the provisional basis for a finding of good cause, and respectfully requests the Court grant this motion to file the unredacted filings under seal.

Dated: March 25, 2024

DAVID CHIU
City Attorney
YVONNE R. MERÉ
Chief Deputy City Attorney
WAYNE SNODGRASS
TARA M. STEELEY
THOMAS S. LAKRITZ
JOHN H. GEORGE
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By: s/John H. George
JOHN H. GEORGE

Attorneys for Defendant CITY AND COUNTY OF SAN FRANCISCO